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**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

RICKEY A. BECHTEL,

Plaintiff :

v. :

DANIEL A. VIRTUE, Business Agent
of the International Brotherhood of
Teamsters; INTERNATIONAL
BROTHERHOOD OF TEAMSTERS;
LOCAL 776, INTERNATIONAL
BROTHERHOOD OF TEAMSTERS;
ABF FREIGHT SYSTEMS, INC.

Defendants :

FILED
HARRISBURG, PA

JUL 12 2001

NO. 1:CV-01-0789
(Judge Rambo)

MARY E. D'ANDREA, CLERK
Per
Deputy Clerk

**MOTION FOR ENLARGEMENT OF TIME
IN WHICH TO ANSWER OR OTHERWISE
RESPOND TO PLAINTIFF'S COMPLAINT**

Defendants International Brotherhood of Teamsters, Daniel A. Virtue and International Brotherhood of Teamsters Local 776 respectfully move for an enlargement of time, until September 7, 2001, in which to Answer or otherwise respond to Plaintiff's Complaint, and in support thereof, aver the following:

1. On or about May 4, 2001, Plaintiff filed the above-captioned Complaint.
2. Defendants International Brotherhood of Teamsters, Daniel A. Virtue and Teamsters Local 776 received the Complaint and request for Waiver of Service of Summons on or about May 22, 2001.
3. Wendy D. Bowie, Esquire, attorney for Defendants International Brotherhood of Teamsters, Daniel A. Virtue and Teamsters Local No. 776 is currently undergoing treatment for herniated lumbar and cervical discs, including a series of epidural steroid injections which will not conclude for at least the next forty-five (45) days.
4. Wendy D. Bowie, Esquire has discussed this matter with Robert S. Mirin, Esquire, attorney for Plaintiff, and Vincent Candiello, Esquire, attorney for Defendant ABF, who kindly concurred in an enlargement of time, until September 7, 2001, in which Defendants International Brotherhood of Teamsters, Daniel A. Virtue and Teamsters Local 776 may Answer or otherwise respond to Plaintiff's Complaint.

WHEREFORE, Defendants International Brotherhood of Teamsters, Daniel A. Virtue and Teamsters Local 776 respectfully move for an enlargement of time, until September 7, 2001, in which to Answer or otherwise respond to Plaintiff's Complaint.

Respectfully Submitted,

IRA H. WEINSTOCK, P.C.

800 North Second Street

Harrisburg, PA 17102

Phone: 717-238-1657

By: Wendy Dullea Bowie
WENDY DULLEA BOWIE

CERTIFICATE OF CONCURRENCE

I, Wendy Dullea Bowie, Esquire, hereby certify that I discussed the attached Motion with Robert S. Mirin, Esquire, attorney for Plaintiff, and Vincent Candiello, attorney for Defendant ABF, and that they concur in this Motion.


WENDY DULLEA BOWIE


CERTIFICATE OF SERVICE

I, Wendy Dullea Bowie, Esquire, hereby certify that upon the date stated below, I served the attached Motion upon the persons named below, at the stated addresses, by first class postage paid United States mail.

Robert S. Mirin, Esquire
AHMAD & MIRIN
8150 Derry Street, Suite A
Harrisburg, PA 17111

James A. McCall, Esquire
International Brotherhood of Teamsters
25 Louisiana Avenue, N.W.
Washington, D.C. 20001

Vincent Candiello, Esquire
MORGAN, LEWIS & BOCKIUS, L.L.P.
One Commerce Square
417 Walnut Street
Harrisburg, PA 17101-1904


WENDY DULLEA BOWIE

Date: 7/12/01